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10 Attorneys for Richard A. Marshack,
11 Trustee of the LPG Liquidation Trust

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UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION

In re:	Chapter 11
The Litigation Practice Group P.C., Debtor.	Case No. 8:23-bk-10571-SC Adv No. 8:25-ap-01208-SC
Richard A. Marshack, Trustee of the LPG Liquidation Trust, Plaintiff, v. Oxford Knox, LLC, a Delaware limited liability company; Buffalo 21 Partners, Inc., a Wyoming corporation; Rick Emmett, individually; Ryan Taylor Connet, individually; Obrik, Inc., a Wyoming corporation; Albright, Inc., a Florida corporation; Jason Dovalina, individually; Rachel Dovalina, individually; Final Season, Inc., a California corporation; Factor In, Inc., a California corporation; Syed Faisal Gilani aka Sye Gilani, individually; BAE Enterprises, Inc., a Wyoming corporation; Rose Bianca Loli, individually; Decacorn Holdings, Inc., a	STIPULATION BETWEEN PLAINTIFF RICHARD A. MARSHACK, TRUSTEE OF THE LPG LIQUIDATION TRUST AND ALL DEFENDANTS EXCLUDING BAE ENTERPRISES, INC. AND ROSE BIANCA LOLI FOR EXTENSION OF DEADLINES AND TO CONTINUE/RESCHEDULE PRE- TRIAL CONFERENCE Honorable Scott C. Clarkson Dept. 5C

1 California limited liability company; Samson Ly,
2 individually; BEW Solar Management, LLC, a
3 California limited liability company; Sean
4 Stephens, individually; Lexicon Consulting, LLC,
5 a California corporation; Daniel Lansdale,
6 individually; United Partnerships, LLC, a
7 California corporation; Ventura Consulting, LLC,
8 a Nevada limited liability; Matthew Church,
9 individually; Frank Brown, individually;
10 Validation, LLC, a terminated California limited
11 liability company; Innovative Solutions, LLC, a
12 Wyoming corporation; MRJR20 Partners, LLC, a
13 California limited liability company; MFCR,
14 Investments, LLC, a Florida limited liability
15 company; Lifesize, Inc., a Wyoming corporation.;
16 Karrington, Inc., a Wyoming corporation;
17 Spectrum Payment Solutions, LLC, a California
18 limited liability company; Jason D. Williams,
19 individually; Home Energy Solutions, Inc., a
20 California corporation; The Coelho Irrevocable
21 Life Insurance Trust, a California trust; JNR
22 Services, Inc., a California corporation; C.A.T.
23 Exteriors, Inc., an Arizona corporation; AZLS
Enterprises, Inc, a California corporation; A
Solution Debt Relief, Inc., a Wyoming
corporation and INVESTLINC Wealth Services,
Inc., a California corporation,
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Defendants.

**TO THE HONORABLE SCOTT C. CLARKSON, UNITED STATES BANKRUPTCY
JUDGE, AND ALL INTERESTED PARTIES:**

This Stipulation (“Stipulation”) is entered into by and between Plaintiff Richard A. Marshack, the Trustee of the Liquidating Trust (“Trustee” and/or “Plaintiff”) for the bankruptcy estate (“Estate”) of The Litigation Practice Group PC (“Debtor” or “LPG”), and in the above-captioned bankruptcy, and all Defendants listed in the caption above except for BAE Enterprises, Inc. and Rose Bianca Loli, by and through their counsel, Golden Goodrich, LLP (these Defendants together with Trustee the “Parties”), pursuant to LBR 7016-1(a)(5) with regard to the following.

RECITALS

A. On or about March 17, 2025, the Trustee filed the above captioned adversary proceeding against the Defendants. Pursuant to the issued summons, the Defendants’ responsive pleading was due on or before May 7, 2025.

1 B. On March 24, 2025, the Court entered an Order Scheduling a Status Conference on
2 May 28, 2025 (“Order”) [Dkt. No. 4]. The Order also established meet and confer and other deadlines
3 for counsel in advance of the Status Conference.

4 C. Although the Parties are cooperating to ensure the Court’s deadlines are timely met,
5 there are 38 named defendants¹ in this Adversary. Accordingly, the Parties need additional time to
6 comply with all of the requirements of Rule 26(f), including the production of documents by each
7 Defendant, a comprehensive list of witnesses for each Defendant, and the possible settlement of claims
8 against one or more Defendants, to the extent possible. Given these facts, the Parties would like
9 additional time comply with Rule 26(f) and request the Court continue the schedule status conference
10 scheduled for May 28, 2025 (“May 28th Status Conference”), continue the Rule 26(f) deadlines, and
11 the pre-trial deadlines, including the deadlines to complete discovery and file any motions related to
12 discovery, established by the Court’s Order Re: Early Meeting of Counsel.

13 WHEREFORE, the Parties agree and stipulate to the following:

14 1. The Defendants identified herein waive service of process of the complaint and
15 acknowledges service of the complaint through their undersigned counsel and shall have until June 6,
16 2025 to answer or otherwise respond to the Complaint.

17 2. Subject to Court approval, the May 28th Status Conference shall be continued to July
18 17, 2025 at 1:30 p.m. (“Continued Status Conference”).

19 3. The deadlines established by the Court’s Order Re: Early Meeting of Counsel are
20 vacated.

21 4. A status report shall be filed fourteen days before the Continued Status Conference,
22 and the Parties will hold their Rule 26(f) meeting on or before June 26, 2025 with an exchange of
23 initial disclosures to occur on or before June 30, 2025.

24 5. Except as set forth herein, the Parties reserve all rights and claims against the other.

25 6. This Stipulation may be executed in one or more counterparts, and facsimile or
26 electronic signatures may be used in filing this document with the Court.

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28 ¹ Validation Partners, LLC was dismissed by Plaintiff on March 19, 2025. (Dkt. No. 3).

1 Dated: May 13, 2025

DINSMORE & SHOHL LLP

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Dated: May 13, 2025

By: /s/ Tyler Powell
YOSINA M. LISSEBECK
TYLER POWELL (pro hac vice)
Attorneys for Plaintiff Richard A. Marshack, Trustee of
the LPG Liquidation Trust

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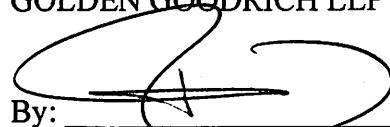
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GOLDEN GOODRICH LLP

By: 
JEFFREY GOLDEN
DAVID GOODRICH

*Counsel for Defendants Oxford Knox, LLC; Buffalo
21 Partners, Inc.; Rick Emmett, Ryan Taylor Connet;
Obrik, Inc.; Albright, Inc.; Jason Dovalina; Rachel
Dovalina; Final Season, Inc.; Factor In, Inc.; Syed
Faisal Gilani aka Sye Gilani; Decacorn Holdings,
Inc.; Samson Ly; BEW Solar Management, LLC; Sean
Stephens; Lexicon Consulting, LLC; Daniel Lansdale;
United Partnerships, LLC; Ventura Consulting, LLC;
Matthew Church; Frank Brown; Validation, LLC;
Innovative Solutions, LLC; MRJR20 Partners, LLC;
MFCR Investments, LLC; Lifesize, Inc.; Karrington,
Inc.; Spectrum Payment Solutions, LLC; Jason D.
Williams; Home Energy Solutions, Inc.; The Coelho
Irrevocable Life Insurance Trust; JNR Services, Inc.;
C.A.T. Exteriors, Inc.; AZLS Enterprises, Inc.; A
Solution Debt Relief, Inc.; and INVESTLINC Wealth
Services, Inc.*

PROOF OF SERVICE

I am over the age of 18 and not a party to this case. My business address is **655 W. Broadway, Suite 800, San Diego, California 92101**. True and correct copies of the foregoing documents:

**STIPULATION BY AND BETWEEN PLAINTIFF RICHARD A. MARSHACK,
TRUSTEE OF THE LPG LIQUIDATION TRUST AND ALL DEFENDANTS
EXCLUDING BAE ENTERPRISES, INC. AND ROSE BIANCA LOLI FOR
EXTENSION OF DEADLINES AND TO CONTINUE/RESCHEDULE PRE-TRIAL
CONFERENCE**

will be served in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On _____, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following person(s) are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **Richard A Marshack (TR)** - pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com
 - **Tyler Powell** - tyler.powell@dinsmore.com, jennifer.pitcock@dinsmore.com; wendy.yones@dinsmore.com
 - **United States Trustee (SA)** - ustpregion16.sa.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL: On May 16, 2025, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

SEE ATTACHED SERVICE LIST

3. BY ELECTRONIC MAIL: On May 16, 2025, I caused such documents described herein to be sent to the person(s) at the e-mail addresses listed below. I did not receive within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

4. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FAX/TELETYPE, OR EMAIL: Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 16, 2025

Wendy A. Yones

/s/ *Wendy A. Yones*

Date

Printed Name

Signature

1 Oxford Knox, LLC
2 Attn: Richard R Emmett, Partnership Representative
251 Little Falls Drive
Wilmington, Delaware 19808
3
4 Buffalo 21 Partners, Inc.
5 Attn: Richard R Emmett, CEO
10 Pointe Drive, Suite 150
Brea, CA 92821
6
7 Rick Ronald Emmett
10 Pointe Drive, Suite 150
Brea, CA 92821
8
9 Ryan Taylor Connet
4155 E La Palma Avenue
Anaheim, CA 92807
10
11 Obrik, Inc
12 Attn: Cloud Peak Law, Registered Agent
1095 Sugarview Drive, Suite 500
Sheridan, Wyoming 82801
13
14 Jason Dovalina
128 W Santa Fe Avenue, Suite C
Placentia, CA 92870-5632
15
16 Rachel Dovalina
736 Oceanview Drive
Fullerton, CA 92832
17
18 Factor In, Inc.
19 Attn: Sye Gilani, Registered Agent
7651 Greenock Way
Riverside, CA 92508
20
21 Syed Faisal Gilani aka Sye Gilani
7651 Greenock Way
Riverside, CA 92508
22
23 Bae Enterprises, Inc.
24 Attn: Cloud Peak Law, LLC, Registered Agent
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Sheridan, Wyoming 82801
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26 Rose Bianca Loli
27 33741 Alcazar Drive
Dana Point, CA 92629
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1 Rose Bianca Loli
2 1220 Ensenada Avenue
Laguna Beach, CA 92651

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4 Samson Ly
208 S Moore Avenue, Apt D
Monterey Park, CA 91754

5
6 BEW Solar Management, LLC
Attn: Sean M Stephens, Manager
7 2560 N Synergy Avenue
Eagle, Idaho 83616

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9 Sean M Stephens
2560 N Synergy Ave
10 Eagle, Idaho 83616

11 Daniel Lansdale
515 W Commonwealth Avenue, Suite 211
12 Fullerton, CA 92832

13 United Partnerships, Inc.
7300 Lennox Avenue, Room J-14
14 Van Nuys, CA 91405

15
16 Ventura Consulting, LLC
Attn: Matthew Church, Managing Member
17 708 Grandview Avenue
Fullerton, CA 92832

18 Ventura Consulting, LLC
19 Attn: Matthew Church, Managing Member
10620 Southern Highlands Parkway, Suite 110-18
20 Las Vegas, NV 89141

21 Matthew Church
22 708 Grandview Avenue
Fullerton, CA 92832

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24 Matthew Church
10620 Southern Highlands Parkway, Suite 110-18
25 Las Vegas, NV 89141

26 Frank Brown
10620 Southern Highlands Parkway, Suite 110-18
27 Las Vegas NV 89141

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1 Frank Brown
2 10881 Pentland Downs Street
Las Vegas, NV 89141
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4 Validation, LLC
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5 708 Grandview Avenue
Fullerton, CA 92832
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7 Validation, LLC
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8 10620 Southern Highlands Parkway, Suite 110-18
Las Vegas, NV 89141
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10 Innovative Solutions, Inc.
Attn: Cloud Peak Law, LLC, Registered Agent
1095 Sugarview Drive, Suite 500
11 Sheridan, Wyoming 82801
12
13 MRJR20 Partners, LLC
Attn: Rick R Emmett, Registered Agent
10 Pointe Drive, Suite 150
14 Brea, CA 92821
15
16 Lifesize, Inc.
Attn: Cloud Peak Law, LLC, Registered Agent
1095 Sugarview Drive, Suite 500
17 Sheridan, Wyoming 82801
18
19 Karrington, Inc.
Attn: Company Sage Agents, LLC, Registered Agent
1095 Sugarview Drive, Suite 100
20 Sheridan, Wyoming 82801
21
22 Spectrum Payment Solutions, LLC
Attn: Samson Ly
208 S Moore Avenue, Apt D
Monterey Park, CA 91754
23
24 Jason D Williams
4155 E La Palma Avenue
Anaheim, CA 92807
25
26 Home Energy Solutions, Inc.
Attn: Rick R Emmett, Financial Manager
27 300 S Harbor Boulevard, Suite 1000
Anaheim, CA 92805
28

1 The Coelho Irrevocable Life Insurance Trust
2 Attn: Rick R Emmett
3 300 S Harbor Boulevard, Suite 1000
Anaheim, CA 92805

4 JNR Services, Inc.
5 Attn: Rick R Emmett
6 10 Pointe Drive, Suite 150
Brea, CA 92821

7 CAT Exteriors, Inc.
8 Attn: Rick R Emmett
9 10 Pointe Drive, Suite 150
Brea, CA 92821

10 AZLS Enterprises Inc.
11 Attn: Hee S Noh
12 9 Traditional Place
Irvine, CA 92602

13 A Solution Debt Relief, Inc.
14 Attn: Cloud Peak Law, LLC, Registered Agent
1095 Sugar View Drive, Suite 500
Sheridan, WY 82801

15 Investlinc Wealth Services, Inc.
16 Attn: West A Cohan
17 10 Pointe Drive, Suite 150
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